

1 EDMUND G. BROWN JR.
Attorney General of California
2 GLORIA A. BARRIOS
Supervising Deputy Attorney General
3 LANGSTON M. EDWARDS
Deputy Attorney General
4 State Bar No. 237926
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 620-6343
6 Facsimile: (213) 897-2804
Attorneys for Complainant
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8 **BEFORE THE**
BOARD OF PHARMACY
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 3768

11 **BOBBY LE AKA BOBBY HOANG**
12 **QUANG LE**
13 **3351 Stevens Avenue**
Rosemead, CA 91770
14 **Pharmacy Technician Registration No. TCH**
48785

A C C U S A T I O N

15 Respondent.

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18 Complainant alleges:

19 **PARTIES**

20 1. Virginia K. Herold (Complainant) brings this Accusation solely in her official
21 capacity as the Executive Officer of the Board of Pharmacy ("Board").

22 2. On or about June 30, 2003, the Board issued Pharmacy Technician Registration
23 Number TCH 48785 to Bobby Le aka Bobby Hoang Quang Le ("Respondent"). The Pharmacy
24 Technician Registration was in full force and effect at all times relevant to the charges brought
25 herein and will expire on December 31, 2010, unless renewed.

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1 **THIRD CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct Involving Sale of Single Cigarettes)**


3 11. Respondent is subject to disciplinary action under sections 4301, subdivision (f) in
4 conjunction with California Code of Regulations, title 16, section 1770, in that Respondent
5 engaged in acts of moral turpitude, dishonesty, fraud, deceit or corruption. Complainant refers to,
6 and by this reference incorporates, the allegations set forth above in paragraph 9, subparagraph
7 (a), inclusive, as though set forth fully herein.

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9 **PRAYER**

10 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
11 and that following the hearing, the Board issue a decision:

- 12 1. Revoking or suspending Pharmacy Technician Registration Number TCH 48785,
13 issued to Bobby Le aka Bobby Hoang Quang Le
14 2. Ordering Bobby Le to pay the Board the reasonable costs of the investigation and
15 enforcement of this case, pursuant to Business and Professions Code section 125.3;
16 3. Taking such other and further action as deemed necessary and proper.

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19 DATED: 8/13/10

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21 VIRGINIA K. HEROLD
22 Executive Officer
23 Board of Pharmacy
24 State of California
25 Complainant

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